

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In Re: Dawn E. Weimar</b>	<b>Debtor,</b>	<b>Chapter: 13</b>
<b>Nationstar Mortgage LLC d/b/a</b>	<b>Mr. Cooper</b>	<b>Bankruptcy No. 20-13637-MDC</b>
<b>-v-</b>	<b>Movant</b>	
<b>Dawn E. Weimar</b>	<b>Respondent</b>	<b>Answer to Motion for Relief</b>

**ANSWER TO MOTION FOR RELIEF of NATIONSTAR MORTGAGE LLC d/b/a MR. COOPER, FILED BY DAWN E. WEIMAR, DEBTOR/RESPONDENT**

And now comes Dawn E. Weimar, Debtor/Respondent, through her attorney Jeffrey A. Fournier, Esquire, files this response to the motion for relief, filed by Nationstar Mortgage LLC d/b/a Mr. Cooper, responds with the following answers to the averments:

- 1) Admitted.
- 2) Admitted.
- 3) Admitted.
- 4) Admitted.
- 5) Admitted.
- 6) Denied. Movants estimated payoff of \$93,280.15 is overstated for costs, fees, expense, escrow and failed to reflect payments made by Debtor and not accounted for by Movant.

7) Denied. Debtor made payments to and received by Movant. Debtor request a full accounting for payment received post petition. Debtor believes post petition payments made weren't processed by Movant.

8) Denied. Movant is not entitled to legal fees and costs and if entitled, must be reasonable, factoring reasonable amount of time incurred and complexity of the work performed.

9) Denied. The outstanding post petition balance due to Movant in the amount of \$3,179.85 is overstated. There is sufficient equity in the premises to adequately protect the Movant.

10) Denied. Movant is not entitled to relief for the automatic stay, there is sufficient equity in the premises to adequately protect Movants interest in the property.

11) Denied. The options Movant proposes to Debtor, resolving pre-petition arrearages, aren't negated nor compromised with the automatic stay in place. The options proposed by Movant can be pursued while the automatic stay is in place.

12) Denied. Movant alleges conclusions of law which do not require a response.

WHEREFORE, Respondent respectfully request that the relief requested by Movant be denied.

Respectfully submitted,

/s/ Jeffery A. Fournier, Esquire  
Jeffery A. Fournier, Esquire  
for Dawn E. Weimar, Debtor/Respondent

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<b>Nationstar Mortgage LLC d/b/a</b>	:	
<b>Mr. Cooper</b>	:	
	:	
<b>Movant</b>	:	
	:	
<b>-v-</b>	:	
	:	
<b>Dawn E. Weimar</b>	:	
	:	
<b>Respondent</b>	:	<b>Answer to Motion for Relief</b>
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**VERIFICATION**

I, hereby state:

1. I verify that the statements made in this pleading/answer are true and correct to the best of my knowledge, information and belief; and
2. I understand that the statements made in this pleading/answer are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

/s/ Dawn E. Weimar  
Dawn E. Weimar, Debtor/Respondent

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<b>Mr. Cooper</b>	:	
<b>Movant</b>	:	
<b>-v-</b>	:	
<b>Dawn E. Weimar</b>	:	
<b>Respondent</b>	:	<b>Answer to Motion for Relief</b>
	:	
	:	

## CERTIFICATION OF SERVICE

I, Jeffery A. Fournier, Esquire, hereby certify that I served that the above Notice of Objection were served to the interested parties listed below by first class prepaid postage mail and/or electronically on January 15, 2021:

William C. Miller, Trustee (Electronically)  
P.O. Box 40119  
Philadelphia, PA 19106-0119

KML Law Group P.C. (Electronically)  
Rebecca A. Solarz, Esquire

Dawn. E. Weimar, Debtor (Hand Delivered)

/S/ Jeffery A. Fournier, Esquire  
Jeffery A. Fournier, Esquire  
Attorney for Debtor/Respondent